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ABSTRACT

A comparative analysis of the administration and implementation of ESEA Title I was undertaken in 8 states and 32 local school districts (4 in each state). The study was designed to determine the extent to which the structure of Title I administration--legislative provisions, program regulations of the Department of Health, Education, and Welfare (HEW) and the United States Office of Education (USOE), federal and state administrative procedures--can and does lead to well-administered Title I programs at the local level. The selection of states, school districts, and schools, along with additional methodological considerations, is described. Also included are conclusions pertaining to the strengths and weaknesses of the federal government's current Title I policies and procedures. Eight problem areas are identified and eight recommendations made. The complete report is available in nine volumes. The last section of the summary identifies the title, authors, estimated length and price, ordering information, and an annotation of each report. (Author/MLF)

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EXECUTIVE SUMMARY

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A STUDY OF THE ADMINISTRATION OF THE ELEMENTARY AND SECONDARY EDUCATION ACT (ESEA) TITLE I IN EIGHT STATES AND THIRTY-TWO SCHOOL DISTRICTS

SYRACUSE RESEARCH CORPORATION

OCTOBER 1977

EA 010 182

EXECUTIVE SUMMARY

Purpose of the Study

This report is a comparative analysis of the administration and implementation of ESEA Title I in eight states and 32 local school districts, four in each state. The broad purpose of this comparative policy study was to provide the National Institute of Education (NIE) and the United States Congress with an understanding of the ways in which and the extent to which federal and state administrative policies and practices influence the management of Title I programs at the local level. More directly, this study was designed to accomplish the following:

- *Determine the nature of state administrative policy and practice.*
- *Analyze the factors influencing different state Title I administrative policies and practices and the consequences of such differences for local Title I administration.*
- *Suggest appropriate future federal administrative strategies, encompassing possible changes in federal Title I legislation, regulations, guidelines, and administrative procedures.*

The task, then, was to determine the extent to which the structure of Title I administration--legislative provisions, program regulations of the Department of Health, Education and Welfare (HEW) and the United States Office of Education (USOE), federal and state administrative procedures--can and do lead to well administered Title I programs at the local level. Local Title I programs should be "well administered" in two respects. First, they should be run in a legal manner; that is, a manner which complies with Congressional expectations and USOE rules and regulations. Second, local Title I programs should be educationally effective; they should be designed and implemented in ways that enhance the probability that participating students will learn more and at a faster rate than they would have if the funds and programs had not been available.

It should be emphasized that it was not the purpose of this study to make definitive judgments about either the legality or the educational effectiveness of the Title I programs examined in the more than 100 schools included in these case studies. The case study teams did not assume the roles of compliance auditors or program evaluators. Rather, the structural linkages that constitute Title I's intergovernmental system were closely examined (the relationship between the federal government and the states, between the states and their school districts, between the school districts and their Title I schools, and between school administrators, teachers, teacher aides, parents, and Title I pupils). Such examinations indicate the conditions and characteristics of the current structure of program administration which seem to produce a reasonable promise of achieving the dual objectives of legally compliant and educationally effective program implementation. In short, this report represents an evaluation of the process of Title I administration, but not of the legal or educational outcomes.

Selection of States, School Districts and Schools

Over 1,200 interviews were conducted, and a comparable number of documents were reviewed pertaining to Title I administration in eight states, 32 districts, and 116 schools. In selecting the agencies and schools to be included in the case studies, the primary objective was to maximize the extent to which key contextual and administrative characteristics were evident for each potential site. Important criteria in selecting states included reported performance on USOE evaluations, geographical location, metropolitan/rural character, presence of a state compensatory education program, state political culture, inclusion in other NIE Title I studies, SEA organizational characteristics, and special problems associated with individual states.

Local district selection objectives were as follows:

. One large urban LEA; where possible, the largest in the state.
. Two middle-sized urban LEAs.
. One relatively small LEA in a rural area.

In six of the eight states the largest urban LEA was selected. In the other two the second largest was selected, in one case because the largest LEA was involved in another NIE study and several other large districts were available. In the other case, the state was predominantly rural and the largest urban-type LEA had constantly been subjected to special studies. Recognizing the possible danger or tendency that many SEA officials might have for recommending LEAs considered by them to be running compliant and/or exemplary programs, the case study teams sought the counsel of non-SEA contacts before final selection was made. Since one of the major purposes of the study was to examine SEA administrative practices that had produced change in local program management, attempts were made by project staff to include some districts in which major changes in Title I program administration had been evidenced in the last three to five years.

A number of criteria were utilized in selecting Title I schools within each district. With an aim to including both typical schools and schools which might also serve as especially illuminating cases, the study teams, on the basis of discussions with LEA and non-LEA personnel plus examination of available documents, selected from two to six schools per district for special attention and visits. The selection criteria utilized for school selection included these items:

. Grade level and spans.
. Size of school.
. Population groups served.
. Subdistrict distribution.

- Principal's tenure and degree of perceived leadership.
- Parent Advisory Council involvement.
- Program emphases.
- Years as a Title I school.
- Participation in the state's compensatory education program.
- Status regarding Title I regulatory compliance ("exemplary," problem areas, change over time, etc.).

Additional Methodological Considerations

The bulk of the interviews and visits in USOE, SEAs, LEAs, and schools took place during the fall of 1976. The average time spent in a state consisted of 38 person-days distributed among the SEA, the four districts, the several schools, and other relevang sites.

Three-member teams conducted the case studies. in the eight states. Pertinent documents were secured before, during, and after the on-site visits. These comprised state and local publications, reports, applications, memoranda, correspondence, technical assistance aids, and a large variety of both formal and informal, official and non-official materials. USOE/HEW reports and correspondence relating to the specific states and LEAs were also obtained and reviewed. Finally, throughout the study there were numerous telephone calls conducted with various individuals at the federal, state, local district, and school levels to obtain additional data.

In all, approximately 1,200 interviews were conducted with over 1,000 individuals. The types of individuals who were interviewed during this study included, in addition to Title I program administrators at the various levels, the following: educational agency executives, decision-makers and policy-developers; fiscal management personnel; research, planning, and evaluation staff; legislative liaisons; instructional and in-service training specialists; dissemination personnel; teachers; administrators; aides; parents; school board members;

university personnel; legislators; legislative analysts; private consultants; community representatives; and, on occasion, students.

To provide focus and a common thread throughout the various cases, a number of functional management areas and special Title I regulatory compliance (issue) areas were selected. At the federal, state, district and school level, special attention was directed to these areas as organizing concepts for obtaining the data that would comprise a major portion of the analysis.

In addition to determining program structures and organizations, the study teams attempted to discover strategies, emphases, and practices related to these areas of management: planning and policy-making; fiscal allocation and budgeting; technical assistance; monitoring; and dissemination/interpretation. The annual LEA application process was also carefully examined.

With respect to Title I regulatory areas, four relating to funds allocation and four emphasizing program development were selected for special attention across the eight case studies. These were as follows:

Funds Allocation Issue Areas	Program Development Issue Areas
. School Selection	. Needs Assessment
. Student Selection	. Program Design
. Concentration of Effort	. Evaluation
. Comparability	. Parent Involvement

Occasionally other regulatory areas would also be addressed because of their particular significance in a given situation. General Aid, Supplanting, Coordination, and Non-Public School Participation were examples of compliance areas occasionally covered in our inquiries.

Major Conclusions

Throughout the case studies, topical areas of Title I administration were separated into two broad categories: the funds allocation issues and program development issues. This was done because the nature of the Title I program posed two administrative questions: (1) Are districts providing resources in the legally prescribed manner so as to assure that these resources are being used for appropriate purposes and by an appropriate population? (2) Are districts designing their Title I activities so that these Title I resources are used in an optimal manner?

Historically, federal Title I administrators have focused their attention primarily on the former concern. Poor federal dissemination, weak state and federal monitoring procedures, inadequate motivation of State Education Agencies to comply with regulations, and recalcitrant school district personnel all contributed to major compliance problems in meeting funds allocation requirements during the first decade.

In the early 1970s, the federal government began to undertake major efforts to improve state and local performance in the funds allocation areas. It has continued this general thrust since that time, emphasizing the meeting of minimum compliance standards and more active dissemination of interpretations of the Title I regulations. In attempting to achieve its goals, the federal government has utilized HEW audits and the threat of such audits as a major vehicle for assuring locally compliant behavior.

As a result, considerable improvement in the administrative performance of SEAs and the LEAs has been evidenced in the last five to seven years. However, the level of administrative attention to the Title I regulations has been decidedly uneven in terms of the compliance categories and administrative effectiveness across the eight states visited. The findings suggest that the current federal role has often been a critical factor in explaining the nature of basic state Title I approaches, whether such approaches are adequate or less than adequate.

The current nature of the federal role remains appropriate for maintaining (and in two of our eight states significantly enhancing) current levels of state administrative effectiveness. However, a different federal approach (one that attempts to understand and then address varying role orientations of SEAs) is necessary if further major breakthroughs are to be attained. The distinctions between funds allocation and program development regulations are of sufficient order to warrant different approaches to their administration in the future.

Based on visits to eight states and 32 districts, the following are our major conclusions pertaining to the strengths and weaknesses of the federal government's current Title I policies and procedures:

1. *The basic framework of the current regulations must be preserved to assure the attainment of federal goals.*

We believe it is important to state explicitly that despite all the problems reported, our considered judgment is that the federal Title I regulations are not fundamentally dysfunctional, taken individually or together. Rather, we found that the regulations, when enforced, provide the foundation for effective administration of Title I programs. The regulations have thus far succeeded in establishing and protecting the existence of categorical Title I programs against countervailing influences in local and state settings. Without the compliance categories of the federal Title I regulations, the interests of educationally disadvantaged populations stand in clear danger of being displaced, by districts and states, in favor of competing interests. However, serious effort must be made to clarify state and local understanding of the requirements in order to clear up remaining compliance problems, overcome rigid responses to federal expectations, and promote program designs in keeping with local resources and needs.

2. *The intergovernmental relationships that function in Title I in the mid-70s should not be viewed as unrelenting combat between the federal government and state education agencies, between SEAs and their LEAs, or between those who accept the principles of compensatory education and those who wish to use the funds for other purposes.*

A lack of sufficient knowledge and managerial capacity and a number of legitimate local factors and concerns contribute to problems of Title I program administration. Improving program implementation over the next decade must begin with the discovery of state and local resources, needs, attitudes, knowledge levels, and administrative capacity. We witnessed a positive attitude on the part of the majority of state and local administrators toward managing the Title I program more efficiently, in basic compliance with federal regulations and in a way that maximizes the probability of effective educational programs. A combative administrative style and the overt use of authority seem productive only where states or local districts refuse to comply with regulations or refuse to make efforts to improve the effectiveness of their programs. Where states and districts are cooperative, productive intergovernmental relationships may require keeping the use of overt authority and sanctions in reserve.

3. *During the last few years sufficient improvement has been made in program administration in many states and local districts to justify confidence in the basic intergovernmental administrative model embodied in the legislation.*

While we would argue that no major, fundamental change in assumptions is warranted, a number of modifications should be considered in order to enhance both accountability and program flexibility.

4. *Most of the eight states and 32 LEAs studied manage Title I in a manner generally consistent with federal expectations and in a manner that has been strongly influenced by the federal government.*

Some of the states and local districts are administering the Title I program in a manner that is highly incompatible with federal expectations,

but these seem to be in the minority. The large majority of SEAs and LEAs in our study are sufficiently well motivated, structured, and staffed to enable them to meet satisfactorily most current federal expectations. Problems remaining in these states and districts are, for the most part, in areas in which federal expectations are either not clearly understood or too modest.

5. *Federal influence has been largely effective in inducing states and districts to address funds allocation responsibilities; it has been far less effective in inducing states and districts to attend to program development responsibilities.*

The federal government has been successful in fostering the development of a basic system of state and local policies and procedures for achieving accountability in the funds allocation areas. This system needs further refinement to maximize state and local performance. However, the system that has evolved is not currently equipped (in terms of motivation, knowledge, and capacity) to deal effectively with issues of program development. This deficiency is reflected in a general lack of systematic and sustained attention to these important responsibilities of states and local districts.

6. *The role orientation exhibited by an SEA is the most critical determinant of its administrative performance and the nature of LEA responses to state administrative initiatives.*

The federal government's interests are best served when state education agencies share federal program goals and exert leadership to assure compliance and program effectiveness. Ideally, the federal government should attempt to change the role orientation of states that currently view their Title I responsibilities as an administrative chore rather than a leadership opportunity. Though state and local contextual factors will probably make uniform attainment of that objective impossible, we are convinced that it is possible for the federal government to significantly affect an SEA's role orientation provided certain administrative policies and procedures are changed at the federal, state, and district levels.

Policy Recommendations

The recommendations presented below deal with the implications of the conclusions cited above. While many of our suggestions for enhancing federal impact do not challenge the current orientation of federal officials in administering the Title I program, some do. These latter suggestions directly respond to our conclusion that *although current federal Title I policies and procedures usually have been appropriate and effective in dealing with problems associated with funds allocation areas, current federal strategies are largely inappropriate and ineffective in addressing equally important federal, state, and local program development responsibilities.*

For addressing program development responsibilities, new federal strategies and policies need to be developed while the federal government simultaneously expands upon its established strategies to deal with problems that remain in the funds allocation areas. Maintaining and continuing established strategies is necessary to assure that old problems do not reappear. We wish to emphasize that meeting these challenges at the federal level is feasible and essential if the Title I program is to achieve goals embodied in the legislation.

Given the findings of this study, suggested changes in the federal government's oversight of Title I administration at the state and local level would be characterized by the following five key principles or themes:

1. *Rigorous attention must be given to completing the implementation of the basic funds allocation accountability system in states and districts where large scale compliance problems persist:*

   -in states, primarily where there are major means/ends compatibility problems affecting responsiveness to federal expectations.

   -in LEAs, particularly where there are overall problems in administrative effectiveness.

2. *Rigorous attention must also be given to upgrading enforcement activities where major compliance problems continue to exist.* Especially needed are:

   -more direct federal involvement with LEAs when states will not perform; and

   -greater coordination of HEW audit and USOE Management Team Review processes.

3. *Continued attention to compliance must be maintained* with objectives to:

   -close knowledge and management capacity gaps in states and local districts; and

   -assure that state and local administrators do not begin to neglect compliance monitoring responsibilities.

4. *Increased attention must be given to program improvement and parent involvement,* and it should be recognized that:

   -strategies may be required in these areas that are different from those that have been generally successful in assuring adequate attention to funds allocation requirements; and

   -greater attention to program improvement and parent involvement should not be implemented at the price of neglecting funds allocation responsibilities.

5. *Increased attention must be given by SEAs to LEA administrative processes as well as to LEA compliance with particular regulations, since those processes are major determinants of actual levels of compliance at the school and classroom levels and in the program development areas.*

The study identified eight problem areas and presents eight recommendations:

Problem Area No. 1

Interpretation of federal Title I regulations and suggestions on how to comply with them that are provided to states and districts are often vague or inconsistent.

Recommendation: *USOE should develop and disseminate more uniform interpretations of the Title I regulations; in addition, administrative coordination between USOE and the Division of Audits in HEW needs to be substantially upgraded.*

Problem Area No. 2

There is inconsistency between USOE and HEW and there is intra-agency inconsistency within USOE and HEW as to what constitutes noncompliance and what fiscal penalties should be imposed.

Recommendation: *The federal government should adopt, implement and actively disseminate uniform regulatory enforcement policies that are based on explicit principles of action in the event of state or local noncompliance.*

Problem Area No. 3

There is unevenness across the states in federal dissemination relating to compliant and effective Title I administration. This results in lack of knowledge and managerial capacity at the state and local level.

Recommendation: *USOE should be required to disseminate to SEAs, and SEAs in turn to LEAs, information pertaining to Title I legislation, regulations, guidelines, interpretations, and penalties in the event of noncompliance.*

Problem Area No. 4

Attention to and understanding of administrative responsibilities in the area of parent involvement was minimal in most of the school districts visited.

Recommendation: *SEAs, with considerably greater assistance from USOE, should intensify their present level of effort to attain compliance by LEAs with respect to the parent involvement requirements.*

Problem Area No. 5

SEAs in their oversight roles rely too heavily on superficial indicators in assessing local administrative effectiveness, especially in program development areas.

Recommendation: *The federal government should seriously consider changing (for many states) the annual LEA application and reporting cycle for Title I to a three- (or four-) year cycle.*

Problem Area No. 6

The federal government has relied too heavily on superficial indicators in assessing state administrative effectiveness and has not adequately addressed the differing role orientations, needs, and capacities of different states.

Recommendation: *The federal government should seriously consider requiring SEAs to submit a comprehensive three-year state plan for administering Title I, with annual updates as needed.*

Problem Area No. 7

Some states lack sufficient Title I administrative resources to adequately fulfill their administrative responsibilities.

Recommendation: *The federal government should redesign the administrative set-aside formula to take into account the number of LEAs in a state. It should also set a minimum set-aside level above the current figure. If possible, any increased state allocations resulting from this proposal should come from additional federal appropriations.*

Problem Area No. 8

There is often an absence of adequate coordination at the federal, state and local levels between Title I and other related categorical programs.

Recommendation: *All federal and state compensatory education programs should be administered within the same department in each SEA and within USOE. In addition, states should be permitted to combine compensatory education funds with Title I if the net result is that the combined funds are administered in accordance with Title I rules and regulations.*

Reports

The report is available in nine volumes. Because of confidentiality requirements, the letters A through H are substituted for state names, and the case study volumes are designated A - H. Volume S is the Synthesis Report. Each case study volume (A - H) contains six chapters, the first on the state education agency (SEA), the next four on selected local education agencies (LEAs), and a sixth concluding chapter. Brief descriptions of the nine volumes follows:

Volume S: Synthesis Report -- A Comparative Analysis of ESEA, Title I. in Eight States.

Principal authors, Robert J. Goettel, Bernard A. Kaplan, and Martin E. Orland with the assistance of Pascal D. Forgione, Jr., and Sheila M. Huff. Estimated length and price: 250 pages, $17.00. Order No. TR-77-564S.*

This report compares and contrasts the state administrative policies and practices and their impact on local administrative activities in the eight states and 32 districts visited. Among the major findings and conclusions cited in this report are that: (a) state influence tends to be more successful and pervasive in getting districts to pay attention to Title I regulatory concerns than it is in encouraging planning and development of improved programs; and (b) the "role orientation" of a state Title I office is a critical determinant of the nature of state administrative impact. A series of recommendations for appropriate future federal policies and procedures are included in this volume.

Volume A: An Analysis of ESEA, Title I Administration in State A.

Pascal D. Forgione, Jr. (Case Study Director) and Howard P. Blackman. Estimated length and price: 300 pages, $14.00. Order No. TR-77-564A.*

State A is a large urban state long concerned with compensatory education. The SEA is often at odds with federal regulations. This state emphasizes individualized instruction, in-class Title I programs and school-level planning, implementation, and evaluation.

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*Individual volumes may be purchased. The listed price includes tax, handling, and mailing (book rate). A complete set of the nine volumes can be ordered for $90.00. The order number for the complete set is TR-77-564X. All checks and money orders should be made payable to Syracuse Research Corporation.

Volume B: An Analysis of ESEA, Title I Administration in State B.

Pascal D. Forgione, Jr. (Case Study Director) and Kabby Mitchell. Estimated length and price: 220 pages, $10.00. Order No. TR-77-564B.*

State B is a small urban state with a tradition of local autonomy. Until recently, little attention had been paid to monitoring LEAs for regulatory compliance; more emphasis had been placed on program development activities. A new chief state school officer has facilitated a major change in the role orientation of the SEA's Title I office.

Volume C: An Analysis of ESEA, Title I Administration in State C.

Sheila M. Huff (Case Study Director) and Martin E. Orland (Co-director). Estimated length and price: 190 pages, $9.00. Order No. TR-77-564C.*

State C is a rural state. State leadership has emphasized strict compliance with Title I regulations. There is little state emphasis on program development, and there are some restrictions on local program options.

Volume D: An Analysis of ESEA, Title I Administration in State D.

Martin E. Orland (Case Study Director) and Sheila M. Huff (Co-director). Estimated length and price: 220 pages, $10.00. Order No. TR-77-564D.*

State D is a large urban state with historically weak and uncoordinated compliance monitoring. Local autonomy is paramount, with the SEA only sometimes recommending changes. One local school district is very large and politically powerful and, accordingly, will sometimes attempt to circumvent the state entirely.

Volume E: An Analysis of ESEA, Title I Administration in State E.

Bernard A. Kaplan (Case Study Director), Howard P. Blackman, and Dana W. Paige. Estimated length and price: 190 pages, $9.00. Order No. TR-77-564E.*

State E is a rural state. While the SEA assures that local activities adhere to federal guidelines, local districts have considerable freedom in Title I program administration.

Volume F: An Analysis of ESEA, Title I Administration in State F.

Robert J. Goettel (Case Study Director). Estimated length and price: 190 pages, $9.00. Order No. TR-77-564F.*

State F is a large urban state with a long history in compensatory education. The SEA has an experienced, dedicated staff who sees itself as striking a workable balance between monitoring for compliance and leadership in program development and evaluation.

Volume G: An Analysis of ESEA, Title I Administration in State G.

Bernard A. Kaplan (Case Study Director), Douglas F. Williams and Dana W. Paige. Estimated length and price: 160 pages, $8.00. Order No. TR-77-564G.*

State G is a rural state with an SEA that takes an informal approach to compliance monitoring and relies heavily on local district initiative for Title I program administration. The SEA's main role has been to provide information on regulatory and program development areas and, recently, to develop special programmatic models and materials.

Volume H: An Analysis of ESEA, Title I Administration in State H.

Bernard A. Kaplan (Case Study Director), and Douglas F. Williams. Estimated length and price: 200 pages, $9.00. Order No. TR-77-564H.*

State H is a large state with both urban and rural areas. The LEAs have traditionally had considerable local autonomy. The SEA is concerned almost exclusively with desk-monitoring and with serving as a conduit for federal funds to the LEAs. This has led to some difficulties in Title I administration from the vantage point of both federal and local officials.

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